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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11  
12 UNITED STATES OF AMERICA,  
13 Plaintiff,  
14 v.  
15 MARK CUYUGAN,  
16 Defendant.

Case No. 2:19-cr-00300-JCM-EJY

**STIPULATION TO MODIFY  
CONDITIONS OF RELEASE**  
(First Request)

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18 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,  
19 Acting United States Attorney, and Simon Kung, Assistant United States Attorney, counsel for  
20 the United States of America, and Rene L. Valladares, Federal Public Defender, and Brandon  
21 C. Jaroch, Assistant Federal Public Defender, counsel for Mark Cuyugan, that the Court modify  
22 the condition of release to allow for the U.S. Pretrial Services Office to provide Mr. Cuyugan's  
23 with his U.S. Passport.

24 The Stipulation is entered into for the following reasons:

25 1. On November 20, 2019, Ms. Cuyugan was released on a personal recognizance  
26 bond with certain conditions, including surrendering his passport to Pretrial Services. ECF  
No.'s 24 & 32.

2. Mr. Cuyugan is requesting that Pretrial Services furnish him his U.S. Passport in order for him to make notarized copies as required by the U.S. Embassy to accommodate travel for his daughter from the Philippines. *See* Ex. A.

3. Counsel for Mr. Cuyugan has spoken with Pretrial Services Officer Emily McKillip who does not oppose this modification to allow Mr. Cuyugan to obtain his U.S. Passport. Officer McKillip will also coordinate with Mr. Cuyugan for the release and return of his U.S. Passport as needed.

4. The government has no objection to this requested modification.

This is the first stipulation to modify conditions of release filed herein.

DATED this 23rd day of March, 2021.

RENE L. VALLADARES  
Federal Public Defender

*/s/ Brandon C. Jaroch*  
By \_\_\_\_\_

BRANDON C. JAROCH  
Assistant Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

*/s/ Simon Kung*  
By \_\_\_\_\_

SIMON KUNG  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4  
5 Plaintiff,  
6 v.  
7 MARK CUYUGAN,  
8 Defendant.

Case No. 2:19-cr-00300-JCM-EJY  
**ORDER**

9 Based on the pending Stipulation of counsel, and good cause appearing,

10 IT IS THEREFORE ORDERED that Pretrial Service has the authority to release Mr.  
11 Cuyugan's U.S. Passport to him and to establish the date and time of its release and return.  
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13 DATED this 23rd day of March, 2021.

14   
15 UNITED STATES MAGISTRATE JUDGE  
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